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Heritage Commission

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Delta Cultural Center

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February 7, 2018

Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington DC 20554

RE: Comment Sought on Draft Program Comment for the Federal
Communications Commission's Review of Collocations on Certain Towers
Constructed Without Documentation of Section 106 Review

The Federal Communications Commission:

The Arkansas Historic Preservation Program (AHPP) Office has received and reviewed the *Draft Program Comment for the Federal Communications Commission's Review of Collocations on Certain Towers Constructed Without Documentation of Section 106 Review*.

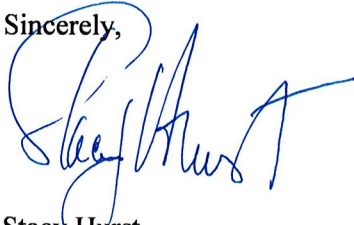
Given the purpose and goal of this draft document, we offer the following comments:

- Although it would be time-consuming and costly, a comprehensive list of towers constructed during the time period in question (March 16, 2001 and March 7, 2005), with indication of which projects had documented Section 106 review, would provide a clear understanding of the inventory and a baseline measurement from which a constructive discussion could occur. This comprehensive list should be shared with each SHPO and THPO. We are willing to assist with collection of data for the inventory, if needed.
- The FCC will need to authenticate that these "Twilight Towers" were built between March 16, 2001 and March 7, 2005. What criteria will be used to qualify a tower and what documentation will be used to demonstrate it?
- (*Section IV Stipulation 1*) – The height of the proposed antenna is addressed but other physical attributes such as color, style, and shape are not addressed. Depending on a tower's location, these factors could cause an adverse effect to historic properties.
- (*Section IV Stipulation 2*) – The size, shape, color, style, etc. of cabinets needs to be specified along with the types of technology that can be used. Also the size and type of shelters need to be defined.
- (*Section IV Stipulation 3*) – Add "except when the tower is located within an historic district or on, or adjacent to, a known eligible or potentially eligible cultural resource;"
- (*Section IV Stipulation 4*) – Add "except when the tower is located within an historic district or on, or adjacent to, a known eligible or potentially eligible cultural resource;"
- (*Section IV Stipulation 5*) – The determination of effect should be determined through consultation with local, state, and tribal entities;

- It should not be automatically assumed that a tower erected between March 16, 2001 and March 7, 2005 or the addition of a collocation had or will result in a no adverse effect to cultural resources. *A stipulation should be added to Section IV stating that towers located within a 1-mile radius of known eligible or potentially eligible cultural resources require Section 106 review.*

Thank you for the opportunity to comment on this document. The AHPP stands ready to assist the FCC at the local level in making determinations of effect and eligibility for the "Twilight Towers" and collocations built or installed in Arkansas between March 16, 2001 and March 7, 2005. If you have any questions, please call Tim Dodson, Section 106 Manager of my staff at 501-324-9784 or email at tim.dodson@arkansas.gov.

Sincerely,



Stacy Hurst
State Historic Preservation Officer

cc: Erik Hein, National Council of State Historic Preservation Officers
Anthony Guy Lopez, Advisory Council on Historic Preservation
Scott Kaufman, Arkansas Historic Preservation Program
Dr. Ann Early, Arkansas Archeological Survey